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12 UNITED STATES BANKRUPTCY COURT  
13 EASTERN DISTRICT OF WASHINGTON

14 In re

15 IDEAL PROPERTY INVESTMENTS  
16 LLC.

17 Debtor.  
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CASE NO. 24-01421-FPC11

DECLARATION OF DANIEL J.  
BUGBEE IN SUPPORT OF DEBTOR'S  
MOTION FOR ORDER ESTABLISHING  
PROCEDURES FOR INTERIM  
PAYMENT OF FEES AND COSTS TO  
PROFESSIONALS

19 I, Daniel J. Bugbee, hereby declare and state as follows:

20 1. I am an attorney at DBS Law, proposed counsel for the debtor-in-possession,  
21 Ideal Property Investments LLC ("Debtor" or "Ideal"). I am over the age of eighteen (18),  
22 competent to testify herein, and I make this declaration of my own personal knowledge. I make  
23 this declaration in support of the Debtor's Motion for an order establishing procedures for  
24 interim payment of fees and costs to the bankruptcy professionals in this case. DBS Law was  
25 approved as counsel for the debtor-in-possession by order of this court on October 7, 2024.  
26 (ECF No. 114)

DECLARATION OF D. BUGBEE IN SUPPORT OF DEBTOR'S  
MOTION FOR ORDER ESTABLISHING PROCEDURES FOR  
INTERIM PAYMENT OF FEES AND COSTS - 4

**DBS | LAW**

A Professional Limited Liability Company  
155 NE 100<sup>th</sup> Street, Suite 205 Seattle, WA 98125  
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2. Due to the complexity of this case, DBS Law, J. Fanelli Properties, LLC (“Fanelli” or “CRO”), and any professionals employed by the unsecured creditors committee (“UCC”) (the “Professionals”) will likely be required to devote substantial time to the bankruptcy proceedings and may be required to forgo other work that would pay monthly.

3. DBS Law was retained to provide advice to the Receiver about bankruptcy options and provided representation until September 4, 2024. DBS Law was never able to be compensated for its pre-petition work advising the receivership and waived its fees for that work. DBS Law continues to hold only a \$10,000 advanced fee retainer for its work in this case.

4. DBS Law is comprised of four attorneys, three of whom have appeared in and are dedicated to this case: myself, Laurie M. Thornton and Dominique R. Scalia. Between the three of us, there is over 50 years of bankruptcy experience – covering nearly every aspect of the code, including substantial work on behalf of creditors, committees, trustees and other interested parties in Chapter 11 cases. DBS Law and the CRO have taken swift action to stabilize the estate, begun the process of selling the real properties to fund recoveries for creditors, gotten a budget formalized and approved (on an interim basis for now), and has gotten the Debtor on track for confirmation of a Plan of Reorganization, but more much more work remains to be done.

5. In the first month after filing, approximately half the billings for DBS Law were related to the Ideal matter. As a result of the workload of this case, DBS Law has turned away new engagements and will likely need to continue doing so for the near future.

6. DBS Law anticipates that the Professionals will incur significant fees and costs per month with respect to the bankruptcy proceedings. Additional professionals may be retained in the case in the future (such as for the UCC), which would increase the amount of anticipated monthly fees and costs.

7. Forcing Professionals, including DBS Law and Fanelli, to only get paid quarterly would create an undue hardship on our firms and on the other Professionals.

1           8.       If necessary, DBS Law has the ability to respond to any reassessment.

2           I declare under penalty of perjury that the foregoing is true and correct.

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4       DATED this 8<sup>th</sup> day October 2024 at Seattle, Washington.

5                               DBS LAW

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7                               By /s/ Daniel J. Bugbee (wet signature on file)  
8                               Daniel J. Bugbee, WSBA # 42412